

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)      Criminal No. 24cr10200
v.	)      Violations:
(1) EAMMA SAFI, a/k/a "TT," a/k/a "Yummy," and	) <u>Count One:</u> Conspiracy to Commit Securities Fraud (18 U.S.C. § 1349)
(2) ZHI GE, a/k/a "Josh Ge," a/k/a "Josh Gez," a/k/a "Jay Gat,"	) <u>Count Two:</u> Conspiracy to Commit Securities Fraud (18 U.S.C. § 371)
Defendants	) <u>Count Three:</u> Securities Fraud; Aiding and Abetting (18 U.S.C. §§ 1348 and 2)
	) <u>Count Four:</u> Securities Fraud; Aiding and Abetting (15 U.S.C. §§ 78j(b) and 78ff(a); 17 C.F.R. § 240.10b-5; 18 U.S.C. § 2)
	) <u>Count Five:</u> Money Laundering Conspiracy (18 U.S.C. § 1956(h))
	) <u>Count Six:</u> Money Laundering; Aiding and Abetting (18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)
	) <u>Forfeiture Allegation:</u> (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))
	) <u>Money Laundering Forfeiture Allegation:</u> (18 U.S.C. § 982(a)(1))

**INDICTMENT**

At all times relevant to this Indictment:

General Allegations

1. Defendant EAMMA SAFI, also known as “TT,” also known as “Yummy,” was a resident of the United Arab Emirates and Germany.
2. Defendant ZHI GE, also known as “Josh Ge,” also known as “Josh Gez,” also known as “Jay Gat,” was a resident of Singapore.
3. Ronald Cordas was a resident of, variously, Nevada and California in the United States, and in the Czech Republic.
4. CC-1 was a resident of France and shared ownership with SAFI in a restaurant in Paris, France. CC-1 previously worked as an investment banker in France.
5. CC-2 resided in France and worked in the mergers and acquisitions department of two publicly traded companies, Atos S.E. and Worldline S.A. CC-2 was an investor in the restaurant owned by SAFI and CC-1, and previously, CC-2 worked for the same investment bank in France as CC-1.
6. CC-3 resided in Hong Kong.
7. CC-4 resided in Singapore.
8. CC-5 resided in Singapore.
9. CC-6 resided in Malaysia.
10. CC-7 resided in Singapore.
11. CC-8 resided in Singapore.
12. CC-9 resided in Singapore.
13. CC-10 resided in Singapore.
14. CC-11 resided in Singapore.

15. Individual 1 resided in Florida and was a close relative of Cordas.
16. Individual 2 was Cordas's girlfriend and, for a period of time, his spouse, and resided in the Czech Republic.
17. Individual 3 was Cordas's friend and resided in California.
18. Individual 4 was a close relative of GE and resided in Singapore and Hong Kong.
19. Individual 5 resided in Thailand.
20. Individual 6 resided in New York.
21. Individual 7 resided in Hong Kong.
22. Individual 8 resided in Singapore.
23. The Advisory Board Company ("ABCO") was a research, technology, and consulting healthcare business that, at relevant times, traded on the New York Stock Exchange ("NYSE") under the ticker symbol ABCO.
24. Alexion Pharmaceuticals Inc. ("Alexion") was a biopharmaceutical company headquartered in Boston, Massachusetts, that, at relevant times, traded on the NASDAQ Stock Market ("NASDAQ") under the ticker symbol ALXN.
25. Atos S.E. ("Atos") was an information technology company headquartered in France with offices worldwide. At relevant times, Atos traded on the Paris Stock Exchange under the ticker symbol ATO, and its American depositary receipts ("ADRs") traded on the over-the-counter market in the United States under the ticker symbol AEXAY.<sup>1</sup>
26. Cytokinetics, Inc. ("Cytokinetics") was a biotechnology company that, at relevant times, traded on the NASDAQ under the ticker symbol CYTK.

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<sup>1</sup> ADRs are U.S. dollar-denominated certificates that trade on American stock exchanges and track the price of a foreign company's domestic shares.

27. Gemalto N.V. (“Gemalto”) was an international digital security company. At relevant times, Gemalto traded on the Euronext N.V., under the ticker symbol GTOMY.

28. Ingenico Group S.A. (“Ingenico”) was a French merchant services technology company that, at relevant times, traded on the Paris Stock Exchange under the ticker symbol INGC. Ingenico’s ADRs traded on the over-the-counter market in the United States under the ticker symbol INGIY.

29. Kindred Healthcare, Inc. (“Kindred”) was a specialty hospital company that, at relevant times, traded on the NYSE under the ticker symbol KND.

30. Medidata Solutions (“Medidata”) was an American technology company that, at relevant times, traded on the NYSE under the ticker symbol MDSO.

31. MorphoSys A.G. (“MorphoSys”) was a biotechnology company that, at relevant times, had a U.S. wholly owned subsidiary MorphoSys US Inc., which was headquartered in Boston, Massachusetts. At relevant times, MorphoSys traded on the NASDAQ under the ticker symbol MOR.

32. Pinnacle Foods, Inc. (“Pinnacle”) was a packaged foods company that, at relevant times, traded on the NYSE under the ticker symbol PF.

33. Principia Biopharma Inc. (“Principia”) was a biopharmaceutical company that, at relevant times, traded on the NASDAQ under the ticker symbol PRNB.

34. Syntel, Inc. (“Syntel”) was a multinational provider of integrated technology and business services that, at relevant times, traded on the NASDAQ under the ticker symbol SYNT.

35. Tiffany & Co. (“Tiffany”) was a jewelry retailer that, at relevant times, traded on the NYSE under the ticker symbol TIF.

36. Wright Medical Group, N.V. (“Wright Medical”) was a medical device company that, at relevant times, traded on the NYSE under the ticker symbol WMGI.

37. Walgreens Boots Alliance, Inc. (“Walgreens”) was a multinational holding company that owned the retail pharmacy chains Walgreens in the United States and Boots in the United Kingdom. At relevant times, Walgreens traded on the NYSE under the ticker symbol WBA.

38. Alexion, Cytokinetics, Kindred, Medidata, Pinnacle, Principia, Syntel, Tiffany, Wright Medical, and Walgreens were issuers that each had a class of securities registered under Section 12 of the Securities Exchange Act of 1934.

Overview of the Securities Fraud Conspiracies and the Scheme to Defraud

39. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, SAFI and GE conspired with each other, and with others known and unknown to the Grand Jury, including CC-1, Cordas, and CC-3, to engage in an insider trading scheme by obtaining material non-public information (“MNPI”) about the financial performance and merger-and-acquisition activity of various publicly-traded companies, including from CC-2, executing securities trades while in possession of that MNPI, and providing that MNPI, in exchange for a percentage of trading profits, to others known and unknown, who traded while in possession of that MNPI.

Object and Purposes of the Securities Fraud Conspiracies

40. The object of the conspiracies was to commit securities fraud by trading in the securities of various companies while in possession of and on the basis of MNPI about those companies. The principal purposes of the conspiracies were to make money and to conceal the conspirators’ actions from others, including regulators and law enforcement.

Manner and Means of the Securities Fraud Conspiracies

41. Among the manner and means by which SAFI, GE, CC-1, CC-2, Cordas, and others known and unknown to the Grand Jury carried out the conspiracies and the scheme to defraud were the following:

- a. Recruiting investment bankers and other corporate insiders, such as CC-2, who had access to MNPI about the financial performance and merger-and-acquisition activity of publicly traded companies and were willing to share that MNPI, in violation of the duties of trust and confidence the bankers and insiders owed to the sources of the information, or that the sources owed to the companies;
- b. Obtaining MNPI about publicly traded companies and sharing it with each other, and with others known and unknown to the Grand Jury;
- c. Recruiting individuals who agreed to trade in the securities of various public companies based on MNPI, including by providing free “samples” of MNPI to them to encourage them to join the conspiracies and thereafter to share in the profits generated by their insider trading;
- d. Trading in the securities of those companies while in possession of MNPI about them;
- e. Leaking MNPI to journalists and news outlets in order to profit on securities trades following the publication of that information; and
- f. Taking steps to conceal the insider trading scheme from regulators, law enforcement, and others, including by communicating about the MNPI in

person, using prepaid or “burner” cell phones and frequently changing SIM cards, and using coded language and encrypted messaging applications.

Overt Acts in Furtherance of the Securities Fraud Conspiracies and the Scheme to Defraud

42. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, SAFI and GE, together with CC-1, Cordas, CC-3, and others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in furtherance of the conspiracies and the scheme to defraud.

43. Beginning in or around November 2016, SAFI and CC-1 recruited GE to join the insider trading scheme. On or about November 17, 2016, SAFI sent a Facebook message to GE: “Since [CC-1] wants to see you this Friday. Plan would be lunch and in the evening drinks.”<sup>2</sup> Later, on or about the same day, SAFI sent another message to GE: “Friday you will be welcomed to our world of business.”

44. On or about November 19, 2016, GE met with CC-1 and SAFI at the restaurant owned by CC-1 and SAFI, and in which CC-2 was an investor.

45. Later, on or about the same day, GE and SAFI exchanged the following coded messages, in which they used the terms “socks” and “shoes” to refer to SIM cards and cellular phones, the term “greens” to refer to money, and the term “running” to refer to insider trading:

SAFI:	Hi bro
SAFI:	Just arrived home
GE:	All good
SAFI:	Did you get the shoes with the socks?

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<sup>2</sup> Unless otherwise noted, all capitalization, typographical, and spelling errors herein are set forth as they appear in the original messages.

GE:	Yeah
GE:	1 shoe
GE:	I didn't get my greens tho hahahahhaah?
GE:	But its all cool our friend and I have an understanding
SAFI:	Is that shoe good for running?
SAFI:	Can you run against 5-8 guys with it?
SAFI:	The greens you will pick up next time you come before the Trop
SAFI:	Trip
SAFI:	But we have a [clapping hands emoji] on that
GE:	OK
GE:	Yeah can run

46. On or about the same day, GE began to recruit additional traders to the scheme. For example, GE sent CC-4 the following message: “Bro got a serious business opportunity to talk about. If you’re down for a serious talk I’m willing to fly back to discuss. Its pretty sensitive but huge upside.” That same day, GE began providing others with MNPI from SAFI about the planned acquisition of Banvit S.A., a Turkish poultry-processing company that traded on the Istanbul Stock Exchange, by BRF S.A. (“BRFS”), a Brazilian food-processing company. The deal was not publicly announced until in or about January 2017.

47. Later that same day, GE sent CC-4 the following messages about the forthcoming Banvit transaction: “You can choose to watch and we can play on the next one if you see my resources are credible,” and “I’ll have to meet you in person to talk.” GE also advised CC-4:

“Trust me I think this is one of those deals you were waiting for,” and “I’ll give you a call from a secure line tomorrow | I’ll let you know when exactly when I know.”

48. On or about November 20, 2016, approximately one day after GE’s meeting at the restaurant with SAFI and CC-1, GE and SAFI engaged in the following coded exchange about recruiting other co-conspirators to the scheme:

GE:	Already raced against one guy he’s happy with the way I run
SAFI:	Wow
SAFI:	Business business business
GE:	Eamma [CC-11] insists on whatsapp lol
GE:	Haven’t told him shit
GE:	He’s calling me now
GE:	Just ran with the black guy looks good just 3-4 more guys to go
SAFI:	Wow
SAFI:	Sounds awesome
GE:	This shit is easier than I thought
GE:	Everyone knows what’s up lol
SAFI:	I told you
SAFI:	Everybody will start sucking your d***
GE:	I thought peeps are gonna be more apprehensive
SAFI:	No

49. On or about November 21, 2016, GE sent SAFI the following messages about changing the SIM cards in his phone in order to keep their scheme secret, and about recruiting

additional traders: “btw mysocks doesn’t work in milan. i think only in paris can you call [CC-1] to check? | otherwise ill try to get a new sock in milan and throw away this one | also, I’m approaching a bunch more people.”

50. On or about the same day, GE sent the following message to CC-7, whom GE was recruiting to join the insider trading scheme: “anyway about the phone convo. It’s about some information but it’s sensitive but it’s pretty big. Trade related. I’ll call you on a secure line.”

51. On or about the same day, November 21, 2016, SAFI and GE exchanged the following coded messages about using burner phones and swapping SIM cards when discussing the scheme and recruiting co-conspirators:

SAFI:	So just get your shoes clean for [Individual 4's] friend
GE:	yeah
GE:	img etting
SAFI:	And get the other socks
SAFI:	Out
GE:	yep
GE:	you think i need a new shoe?
GE:	or same shoe is fine but new socks
GE:	Hk is gonna watch the race
SAFI:	Who is Hk?
SAFI:	But new socks and shoes is a must bro
GE:	both socks and shoes?
GE:	you sure?
GE:	idk where i can get shoes in paris

SAFI: Yes

GE: cant get just socks?

SAFI: Because that's the major mistake people do

SAFI: Btw

GE: because [CC-1] told me its fine

SAFI: You aren't in Milan?

SAFI: Ok if he said

GE: im in milan

GE: ask him again

SAFI: But usually try to frequently change

GE: ill change after every game okay?

SAFI: Because if you will be trapped with the shoe in a new sock

SAFI: They will find the other socks as well

GE: same enough?

GE: ook

GE: safe

SAFI: You can do it this time

GE: ok

SAFI: But try to stick to the other method

GE: ok ill throw away my shoe this time too i guess

52. On or about the same day, SAFI and GE exchanged the following messages about recruiting CC-7 to the scheme:

SAFI: is this Guy liquid?  
GE: yes  
GE: lol  
GE: hes a trader  
GE: he started by trading energy futures  
SAFI: Ok  
SAFI: Then I am sure  
SAFI: He will suck your d\*\*\*

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SAFI: 100% he will start sucking you instantly  
SAFI: Like most people will do in future  
GE: yeah ill work it out  
SAFI: Already running on new shoes?  
GE: i think shoes is fine for now i need new socks and  
thats it  
SAFI: Ok but why don't you get it?  
SAFI: Isn't it an easy one?

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GE: its the same but still dont think I need one for now ill  
get it after this deal

53. On or about November 24, 2016, SAFI sent GE a message telling him that GE  
“should invite | And onboard | More watchers | To give them appetite for the game” and “race is  
on the way – Check out [smiling face emoji].” GE responded by asking whether it was “safe to

check with my computer? Or no," referring to whether he could search for news about the forthcoming transaction on the internet. SAFI replied: "No better run outside."

54. On or about the same day, SAFI sent the following message to GE about forthcoming profits from the scheme: "Millions are like 12-15 months away in worst case | 100s of k | Just few months."

55. On or about the same day, November 24, 2016, after GE proposed to Individual 8 that GE would fly to Singapore to discuss the insider trading scheme "face to face" with him, GE and Individual 8 exchanged the following messages about the MNPI regarding the Banvit and BRFS transaction:

Individual 8:	funny enough, i have a good friend who's in the brazilian poultry Business
GE:	haha nice
Individual 8:	what was the brazilian company's name again?
GE:	like i said we could talk and see if perhaps you have some friends too
GE:	ill give you a call
Individual 8:	k
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GE:	anyway look you know all you neednow. Let's see what we can do for te next deal yeh
Individual 8:	alright
GE:	we have to keep our communication about this low tech yeh
Individual 8:	can
Individual 8:	oh shit

Individual 8: the brazilian friend works for the company that you mentioned haha

GE: haha fun fun

GE: bro you really have to keep it like really really discreet about all the stuff we discussing

56. On or about December 18, 2016, GE and SAFI engaged in the following group message exchange with CC-5, whom GE and SAFI were soliciting to recruit additional traders to the scheme:

CC-5: I have got a question again...When is the acquisition will be happening ?

CC-5: In January ?

SAFI: In January I might sell shares in my restaurant [winking face emoji]

CC-5: I mean the Stock code that u just gave me.

Less than 30 seconds after CC-5 asked about the “stock code that u just gave me,” GE initiated a Facebook voice call, which lasted less than 30 seconds, to warn CC-5 that his messages about the scheme were too explicit. The group message conversation then continued:

CC-5: Understood bro

CC-5: Thanks a lot

GE: All good bro

CC-5: Should we also get a group chat on whatsapp?

CC-5: [winking face emoji]

GE: I have no whatsapp but you can simply Add eamma up. I'll get one asap when I'm back in milan

57. On or about the following day, December 19, 2016, CC-5 sent GE the following coded message about the MNPI regarding the Banvit and BRFS transaction, in which CC-5

advised GE that additional potential traders were “observing” the Banvit MNPI as a test, and were interested in the future in MNPI regarding American stocks: “Btw...those 2 uncles they didn’t buy the chicken.... they are observing how’s the chicken being cooked..... they don’t like Turkish dish... they like US dishes..... and they are getting used to London and US dishes that’s why.... They are now seeing the chicken as a test dish.... Let them seeing how tasty of the dish that the chief can cook.” GE responded: “thats exactky what we need you did great bro.”

58. On or about December 31, 2016, SAFI and GE engaged in the following coded message exchange in which they referred to the pending Banvit acquisition, which had not yet been publicly announced, as a “race”:

GE:	my boy [CC-7] is closed
GE:	but we need to talk numbers
GE:	the rest still watching
GE:	since the race isn’t over yet?
SAFI:	Amazing
SAFI:	Yes
SAFI:	It will be over very fast
GE:	as soon as it happens
SAFI:	So it means my friend we are already together successful!
GE:	you’ll be sure the news will hit my boys
GE:	and they will see

SAFI: So amazing

GE: lol

59. On or about January 10, 2017, the day after a report by the Reuters news service that BRFS and the sovereign wealth fund of Qatar had agreed to purchase the operations of Banvit in a joint venture, GE and SAFI exchanged the following coded messages:

SAFI: Hi bro I went to sports now I am really tired the race is over finally!

GE: fycj yeah nce

SAFI: So [winking face emoji]

GE: letting all my friends know now

60. Later, on or about the same day, GE sent the following messages to CC-5 about the Banvit acquisition: “hey bro | news is out with the thing we talked abou | about | you can let the uncles know and we can proceed to the next one.” GE and CC-5 subsequently had the following exchange, in which GE reminded CC-5 not to be explicit about their insider trading scheme over Facebook Messenger:

CC-5: Hey bro.... sorry replying u late... been busy for whole day [two loudly crying emojis]

GE: haha alll good

GE: it's just exciting news!!

GE: your uncles would be happy now i think

GE: hahaha

CC-5: Did they make a public offer for subscribing shares from the present shareholders at \$10?

GE: yes

CC-5: it didn't reach to 10\$

CC-5: Only 9.xx\$

GE: the news is out today

GE: 6 hours ago

GE: check it now

CC-5: I looked on the google finance news, it didn't mention about public offer to subscribe shares from the present shareholders at 10

CC-5: Let me check again

GE: not yet but they announced the acquisition

CC-5: I only saw the acquisition was done

GE: thats all it takes

GE: yes

CC-5: yes

GE: thats enough

GE: it will be declared soon

GE: so its pretty much done

GE: btw lets not talk so freely on fcebook hahaa

CC-5: haha

61. On or about the same day, GE and CC-5 exchanged the following messages, in which CC-5 reminded GE that he was interested in trading only American stocks:

CC-5: I have told your friend Eamma [SAFI]

CC-5: I want the US stocks rather than other countries

GE: i know

GE: we can give now

GE: but doesyour uncles want to play?

GE: because if they are now in the deal

GE: we will give now

CC-5: He keeps talking about his business hahaha but nevermind... I will try to ask if any prospect investor for him

GE: but they will be expected to pay out

GE: you know what i mean?

GE: we already have deals existing

CC-5: Eamma talked about his tech company haha

GE: yeah i understand

GE: let me give you a call later

CC-5: Sounds like he has no interest to talk about stock

CC-5: Haha

GE: he does

GE: but not over facebook

GE: haha

CC-5: Okay sure haha

GE: bro we would make bank on this

GE: this one was just to show them

GE: now they see me and you are for real

GE: they will put money down and make money

CC-5: Do they need to sign any agreements or contracts with u guys

GE: nope

GE: all trust basis

CC-5: Btw they are only interested in US or HK stock market

GE: i get it

CC-5: So we need to check their receipt of how many shares bought in order to calculate the % of commission

GE: bro

GE: lets not talk here

CC-5: Okay

CC-5: I will call u tmr on WeChat<sup>3</sup>

CC-5: Is that okay?

GE: ok

CC-5: [a thumbs up emoji and a winking face emoji]

GE: bro i just talked to my friend

GE: he was telling you about his tech company because lets not discuss other stuff here

GE: hahahahaha

GE: you cant get confused

CC-5: Haha lol

GE: haa

62. On or about the same day, January 10, 2017, GE exchanged the following messages with CC-11, a trader he sought to recruit to the conspiracy with MNPI about the Banvit acquisition:

GE: hey bro just to let you know the news is out with the thing we talked about. The prophecy came true [smiley face emoji].

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<sup>3</sup> WeChat is a China-based social media messaging app.

GE:	haha
GE:	I'm sure your friend is very excited to talk to us now.
CC-11:	U make the money?
GE:	of course bro
CC-11:	Ok
GE:	but this is just one deal
GE:	the sample
GE:	we have a new one every two weeks

63. On or about the same day, GE sent the following message to CC-7 about the Banvit acquisition: “hey bro remember what we talked about – the news is out [smiley face emoji]. So we can start playing anytime[.]”

64. In or about March 2017, GE and SAFI began to recruit Cordas to the insider trading scheme, including by providing Cordas with MNPI regarding the potential acquisitions of Kindred and Pinnacle, in order to encourage Cordas to join the scheme and to share his future insider-trading profits with GE, SAFI, CC-1, and other co-conspirators.

65. On or about March 9, 2017, GE and SAFI exchanged the following messages about Cordas:

GE:	So we have hit quite a few people already
GE:	I pick things up fast don't I ahhaa
SAFI:	Yes bro you do
SAFI:	But nothing new for me I know good people
GE:	RonCordas.com
GE:	hes interested in racing too

GE: me and him became quite close friends actually

GE: like actual friend friend we hang out and chat all the time

SAFI: Who is that guy?

GE: hes a good friend of mine that I met here

GE: his profile is right there

GE: worth about 10 mil

SAFI: Sounds great

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GE: Ron has an apartment in Czech

SAFI: [winking face emoji]

GE: so we can meet around Poland

66. On or about April 18, 2017, SAFI began to purchase shares of Kindred.

67. On or about April 26, 2017, GE reminded Cordas that he would not need to kick back a share of the illicit trading profits he generated from the initial “samples” of MNPI GE had provided about the forthcoming Kindred and Pinnacle mergers, telling Cordas: “btw its free you know that right,” and “you don’t need to pay us a cent for the first ones”.

68. On or about May 15, 2017, SAFI began to purchase shares of Pinnacle.

69. On or about May 31, 2017, Cordas began purchasing Pinnacle and Kindred call options.<sup>4</sup>

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<sup>4</sup> Call options are a type of security that gives the buyer the right to buy a stock at a specified price—known as the “strike price”—within a specified timeframe. Call options provide a way of profiting from the near-term appreciation of a stock’s price, but such options are worthless if the stock’s price does not appreciate beyond the strike price, by at least the cost of the option, by the time the option expires.

70. On or about the same day, GE and Cordas exchanged the following messages:

GE:	check Signal <sup>5</sup>
GE:	:)
Cordas:	Awesome I will check it out
GE:	yep
GE:	haha
GE:	we can talk anytime here anyway
Cordas:	how confident were you on that
GE:	100%
GE:	:)
GE:	and im giving it no strings attached
GE:	but in the future when you can play with the size we are used to we can do deals together bro
Cordas:	okay thank you bro I really appreciate it. It's just bad timing with my available funds.
Cordas:	but I'm definitely going to do something and let you know what I did
GE:	Ok
Cordas:	hey I'm leaving next week for Czech Republic. Are you going to be in Europe any time in the next 5-6 weeks?
Cordas:	I'm going there to have fun a bit while I manage getting my apartment there remodeled.
Cordas:	and hopefully when I see you I will be thanking you for introducing me to your two friend today (:

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<sup>5</sup> Signal is an encrypted messaging service.

GE: Haha for sure

71. On or about June 1, 2017, after the Reuters news service reported that Conagra Brands had approached Pinnacle to express interest in acquiring the company, GE and Cordas exchanged the following coded messages, in which they referred to the increase in Pinnacle's stock price after the news was announced as a "party" and the stocks they traded as "girlfriends", and in which GE reminded Cordas that he would eventually need to kick back a share of his illicit profits from future deals as a "cover charge":

GE:	bro the news hit 6 hours ago
Cordas:	Yeah I saw the after-hours party
Cordas:	[minion celebrating GIF]
GE:	Boom
GE:	I hope you brought some friends to the party
GE:	;) )
Cordas:	It was a little bit last notice for me to bring all my friends but a few of us got into the club before it closed
Cordas:	Thanks for hooking me up with your girlfriends they're pretty fucking hot
Cordas:	Hey bro I know im gonna owe you one, just know I will return the favor
Cordas:	Meanwhile if you have any more hot girls like that for me to tag here, hmu!
GE:	yeah all good
GE:	anytime bro
GE:	but I told you eventually we need to take a covercharge for taking them tot the club

GE: and you know the number

GE: ;)

Cordas: Absolutely

72. On or about June 2, 2017, after CNBC reported that deal talks between Conagra and Pinnacle had terminated without a merger, Cordas sent GE the following coded message inquiring whether he should hold onto the Pinnacle securities he had purchased: “Hey bro that one girl is being a total bitch. I spent a bunch of money on her but she isn’t putting out. Should I hang with her or dumped her now[?]”. GE and Cordas then exchanged the following coded messages in which they again referred to the prospective corporate merger partners as “girls” and “models”:

GE: Or if you’re talking about the 2 girls I introduced 2 days ago. one of them you can spend up to 70 on the other would be like 15 so when see you’re spending a dollar close to that just fuck it

GE: ;)

GE: Don’t worry I’m right can’t believe what the news say about models you know lol they don’t know shit

Cordas: right, yeah that’s what I was wondering. Her emotions were really up and down after what that guy Marks said about her

Cordas: you know, what Mark said in the news

Cordas: I’ll hang in there and hope to get laid then (:

73. On or about June 2, 2017, GE and CC-4 exchanged the following messages, in which GE explained that in the future, he would either use first names as a code for the names of the stocks—with the first letter of the names a reference to the stocks—or they could speak more freely on encrypted apps such as Telegram or Signal:

GE: Yo bro just wanna let you know don't worry about how voliltile the stuff I gave is today it's still good

CC-4: Yea I'm just waiting on a response

GE: Yeah great

GE: Let's meet again on Monday if possible

CC-4: Sure my guy can't find the symbol on Nasdaq

GE: which one?

GE: give me a call

CC-4: I can't now

CC-4: Inna bit

GE: ill call you

GE: its NYSE

GE: btw

GE: HAHA

CC-4: Yea Nasdaq

GE: both of them

CC-4: I'm busy at the moment

GE: okay

GE: just call me when youre free

GE: when you call me ill give you names just take the first letter of those okay?

GE: bro

GE: or can you just get telegram<sup>6</sup> or signal?

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<sup>6</sup> Telegram is an encrypted instant messaging service..

GE: ill write you there

CC-4: Yea I have telegram

74. On or about June 6, 2017, GE and CC-6 exchanged the following messages, in which GE offered to explain to CC-6 how the insider trading scheme worked:

GE: I think we gave you a little tip the other day and I just wanna have a sit down to let you know how we work and how we get these tips

GE: think it's pretty attractive for you

CC-6: the stock tip?

CC-6: in USA

GE: yeah but better talk in person hahaha

CC-6: Pinnacle Foods

GE: yeah bro not wise to talk here

GE: let's talk in person

75. On or about June 22, 2017, Cordas sent GE a coded message inquiring whether the Pinnacle and Kindred transactions remained on track: "If those two model chicks had a change of heart, you'd let me know right?" GE responded: "Yes. All good for now bro." Cordas responded: "cool, still just kissing for now hoping for a threesome soon [smiley face emoji]."

76. On or about June 25, 2017, GE and SAFI exchanged the following messages about meeting Cordas at the Paris restaurant to discuss Cordas's participation in the insider trading scheme:

GE: hey bro

GE: wondering if you in paris still

GE: my friend Ron wanna visit you guys

GE: he's down for racing  
 GE: btw  
 GE: if you're not there perhaps he can meet [CC-1]?  
 SAFI: Hi bro  
 SAFI: I am in Paris  
 SAFI: Where is he?

77. On or about June 26, 2017, GE and SAFI exchanged the following messages about arranging the meeting with Cordas in Paris, and in which they referred to the pending Pinnacle transaction by the code name "Patricia":

GE: Ron condas  
 GE: said he would do lunch om 29<sup>th</sup>  
 SAFI: Ok confirmed  
 GE: okay time and place?  
 GE: hexagon?  
 SAFI: Tell him 1:30pm [address of restaurant owned by SAFI and CC-1]  
 SAFI: [Name of restaurant owned by SAFI and CC-1]  
 GE: nice  
 GE: yep set  
 \*\*\*  
 GE: hes cool  
 GE: he's one of us  
 \*\*\*  
 SAFI: I trust you

SAFI: Is he legit

SAFI: ?

GE: he's legit

SAFI: Ok

GE: he's not super big size but he's legit

GE: you know when someone is not super big is easier

GE: and I feel quite comfortable for everyone

SAFI: How much time you spent with him

GE: quite a lot like total in person up to 7 days

GE: but we talk tons

SAFI: Have you been to his place?

GE: nope. but I checked him out he's legit and I see this kind of things by character

SAFI: And he was watching?

GE: he's watching

SAFI: and he's playing but I told him this one he can watch or play for free

GE: he said he's playing a bit too because he trusts me

SAFI: Great

SAFI: He plays the Patricia?

GE: he got a bit nervous because he was leveraging a bit I think

GE: for patricia

SAFI: Good

GE: so he was panicking a bit there haha

SAFI: Good

78. On or about June 27, 2017, GE sent Cordas the following coded message in which they referred to Kindred by the codename “Kelly”, and discussed a delay in the company’s acquisition: “Kelly is out of our vision for like 2 weeks so we are all getting out- we can come back on guest list later.”

79. On or about the same day, GE and CC-6 engaged in the following coded exchange about the delay in Kindred’s anticipated acquisition, and again referred to Pinnacle as “Patricia”:

GE: hey bro if you’re looking at the stuff I told you

GE: we are canceling our RSVP for Kelly’s party for the time being because she’s going missing for 2 weeks and no one knows her whereabouts

GE: and we like to be safe

GE: but everything else is still good

GE: anyway we planning to get back on guestlist with Kelly later

CC-6: I don’t understand what you mean by Kelly’s party bro

GE: the thing I told you about

GE: same first name

GE: :)

GE: I told you 2 names kelly and patricia

GE: patrcia;s fine but kelly is missing for awhile

CC-6 ok I have been monitoring. both not moving anywhere really 4-8 weeks now

GE: yep all good we tell you the final date only you know

GE: itsa more for people to hold

80. On or about the same day, GE sent a message to CC-4 noting the delay in the Kindred transaction: "Kelly is missing for 2 weeks so my friends stopped RSVPing her partying until she comes back," to which CC-4 responded: "yeah I'm sinking my stuff into another deal..."

81. On or about June 29, 2017, Cordas met with SAFI and CC-1 at the restaurant SAFI and CC-1 owned in Paris to discuss Cordas's participation in the insider trading scheme.

82. Following the meeting, Cordas and GE exchanged the following coded messages in which they discussed the fact that Cordas would be expected to kick back 50 percent of his future insider trading profits to GE, SAFI and CC-1, but that they had given him the MNPI about the Pinnacle acquisition for free:

Cordas: Hey meeting was great. Thanks for the intro. (:

GE: Nice

GE: You calm you happy? Haha

Cordas: I will be, but right now im a little behind

GE: Haha okay

GE: Anyway now can ask him anything and you guys have direct contact so it's easy

Cordas: I understand the game different now so I won't make the same mistakes again.

Cordas: What did you tell me the cover charge was?

GE: It'll be higher than 70 which I told you originally

GE: Way higher

GE: Bidding war going on now

Cordas: I meant the % for you guys

GE: 50

GE: I told you haha

GE: Promoters take 50% profit off the door sales

Cordas: Ok got it. I must have made up some shit in my head then, I remembered different. But no worries it works.

GE: Yep

GE: You know we have the best parties

GE: How was the food there

GE: At the restaurant

Cordas: No doubt

Cordas: Food was awesome

GE: BTW bro it's 50% but Patricia is free

GE: Bro

GE: If he told you something else there

Cordas: Definitely the best lamb i ever had.

GE: That one would be the next one and it'll be charged

Cordas: Got it.

83. On or about July 8, 2017, GE and SAFI exchanged the following coded messages in which SAFI informed GE that the Kindred acquisition was no longer happening, but the Pinnacle acquisition remained on track:

GE: Btw wondering if your friends found Kelly yet haha

GE: Just remembered some stuff I forgot to ask

GE: Im asking because the cover charge for her party is still going up so it seems like the party is still on somehow

GE: bro??

SAFI: Hi bro

SAFI: Kelly is off the table

SAFI: You should check her news

GE: ok

GE: patricia is still on yeah

GE: you wanna talk on other?

SAFI: Patricia will take longer

84. On or about July 5, 2017, SAFI provided Cordas with MNPI that ABCO was in discussions to be acquired, and Cordas began to acquire ABCO securities.

85. On or about the following day, July 6, 2017, SAFI began to purchase ABCO shares.

86. On or about July 9, 2017, three days after the Bloomberg news service published a news story reporting that UnitedHealth and the private equity firm Vista Equity Partners were nearing a deal to acquire ABCO, Cordas and GE exchanged the following messages:

Cordas: and any chance you know when the next other party is?

Cordas: don't bug anybody about it, just curious if you knew

GE: not yet it'll take awhile I think

GE: ill sort everything out this week

Cordas: despite being late to the advisor party, I still had a nice time (:

GE: last week a bit stretch

GE: stretched

Cordas: ok no worries, I'm sure E will contact me when he has something

GE: I think my friend told you everything you need anyway

87. On or about November 24, 2017, SAFI began to purchase shares of Gemalto and provided Cordas with MNPI obtained from CC-2 that Atos, where CC-2 worked at the time, planned to make a bid to acquire Gemalto.

88. On or about November 29, 2017, Cordas began to purchase Gemalto ADRs based on the MNPI SAFI provided.

89. On or about Friday, December 8, 2017, Cordas instructed Individual 1 to purchase Gemalto shares based on the MNPI he had obtained from SAFI: "FYI, last chance to buy GTOMY before it takes off (:"

90. On or about the following Monday, December 11, 2017—after Atos publicly announced its bid for Gemalto—Cordas removed SAFI as a friend on Facebook in an attempt to conceal their relationship.

91. On or about June 29, 2018, Cordas began purchasing Syntel call options after SAFI tipped him with MNPI from CC-2 that Atos had agreed to acquire Syntel.

92. On or about July 2, 2018, SAFI began purchasing shares of Syntel.

93. On or about August 13, 2018, approximately three weeks after Atos announced that it had agreed to acquire Syntel, Cordas withdrew 100,000 Euros in cash from a bank account he

controlled, and, at SAFI's direction, met SAFI in Vienna, Austria, to give him that cash as partial payment for the MNPI SAFI had provided.

94. On or about Monday, October 8, 2018—after meeting with SAFI in Germany the preceding weekend—Cordas sent a message to GE stating that he “got some good advice from our friend.”

95. On or about October 22, 2018, after SAFI tipped Cordas with MNPI obtained from CC-2 that Atos would announce a negative profit warning, Cordas began selling short Atos contracts for difference in a brokerage account he controlled.<sup>7</sup>

96. On or about January 3, 2019, GE sent the following messages to CC-8 in an attempt to recruit him to the insider trading scheme: “[CC-9] told me a month ago that you might be interested in some investment opportunities | haha | thought perhaps we can meet. I've a present for you.”

97. Three days later, on or about January 6, 2019, GE and CC-8 met at GE's residence in Singapore to discuss the scheme. After the meeting, GE and CC-8 agreed to communicate about the scheme over Telegram, in order to avoid detection of the scheme by regulators and law enforcement.

98. On or about January 9, 2019, GE likewise directed Cordas to switch to Telegram.

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<sup>7</sup> Contracts for difference (“CFDs”) are a form of security that allows investors in foreign markets to participate in the price movement of stocks traded on exchanges in the United States without actually owning the underlying stocks. Short-selling is a trading strategy that seeks to profit from an anticipated decline in the price of a security. Short-selling typically involves borrowing shares of stock and selling them, in anticipation of repurchasing them later at a lower price.

99. On or about the following day, January 10, 2019, GE and SAFI tipped Cordas with MNPI obtained from CC-2 that Atos planned to spin off its Worldline subsidiary, and Cordas began to purchase Atos CFDs in a brokerage account he controlled.

100. On or about January 14, 2019, after CC-8 did not respond to several messages, GE exchanged the following messages with CC-9, who had introduced GE to CC-8:

GE:	Hey bro can you do me a favor and give [CC-8] a call and ask him to contact me?
GE:	I'm in a deal with him will tell you more next time
CC-9:	I'm in kl bro
CC-9:	Oh is he investing?
GE:	Yeah let's not talk here about this tho
CC-9:	I will wa him
GE:	Ok
GE:	Give me his WA number
CC-9:	[Sends a screenshot containing CC-8's WhatsApp contact information]

101. Later, on or about the same day, CC-8 sent GE a message, "Hey bro," to which GE responded by directing CC-8 to switch to the more secure Telegram messaging app: "Yo bro come on other."

102. Later that same day, January 14, 2019, CC-8 began purchasing Atos call options based on MNPI GE provided about the anticipated Worldline spinoff.

103. On or about January 16, 2019, GE and CC-8 exchanged the following messages:

CC-8:	...If this deal make me a billionaire in usd, I resign tomorrow and will be 100x more easy to reach [smiling tongue out emoji]
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GE: Haha yeah

GE: Not billionaire but millionaire is possible

104. On or about January 18, 2019, GE exchanged the following messages with

Individual 5:

GE: Bro if we can meet asap

GE: Maybe you wanna come into another deal I'm doing

Individual 5: What's up

GE: I'll discuss with you in person

GE: Can't talk here

Individual 5: Ok

GE: I'll write you quickly on telegram

105. On or about January 28, 2019—two days before the Worldline spinoff was publicly announced—GE and CC-8 engaged in the following message exchange:

GE: get ready on 30<sup>th</sup> we can be ready to cash out already

GE: [winking face emoji]

CC-8: Ready anytime bro. Haha

106. On or about the same day, GE sent the following messages to Individual 4, referring to the Worldline spinoff: “need to talk...we have a big play now...so if you can cash our all your current positions even at loss...and fund me...we can do...I new one.”

107. On or about January 30, 2019, GE sent CC-8 the following messages, instructing him to be ready to sell his Atos securities: “hey bro | please be very available today | if you can get off work today | you should | from 4pm onwards | be very available | don’t make any independent

moves | ill instruct you what to do.” Later the same day, GE sent CC-8 the following messages: “you ready? | just stay online and reachable from now on.”

108. Later, on or about the same day, January 30, 2019, after Atos publicly announced its intention to spin off a stake in Worldline to its shareholders, CC-8 sold the Atos call options he had purchased approximately two weeks earlier.

109. On or about the following day, January 31, 2019, GE sent CC-8 the following messages instructing him to pay the kickback for the MNPI he had provided: “hey bro so now that you’re out already you can should start transferring the profits on my share to your bank | since it might take a few days for the money to go back.”

110. On or about the following day, February 1, 2019, GE and CC-8 exchanged the following messages, in which GE noted that he needed to pass on a portion of the kickback CC-8 owed to their co-conspirators:

GE:	hey bro
GE:	you got the money transferred yet
CC-8:	Hey bro, I initiated already, but looks like haven’t received yet
GE:	Nice bro
GE:	Let me know when receive
GE:	I gotta collect from you asap gotta pay some peeps [winking face emoji]
CC-8:	Sure bro

111. On or about February 19, 2019, after GE and SAFI tipped Cordas with MNPI that the French company Dassault Systems had agreed to acquire Medidata, Cordas began purchasing Medidata securities, including call options over the BOX Exchange, in Boston, Massachusetts.

112. On or about April 2, 2019, Cordas sent a message to Individual 1 that he was “loading up the truck on Medidata.”

113. On or about the following day, April 3, 2019, GE sent the following messages to CC-9 about the Medidata spinoff: “lets meet soon | we need to talk soon | the play is soon just got word.”

114. On or about April 5, 2019, GE sent the following messages directing CC-8 to the more secure Telegram messaging app so that he could pass on MNPI about Medidata: “Bro | Check the other app | Bro | I got something for you.”

115. On or about May 7, 2019, GE sent the following message instructing CC-8 to be prepared to purchase Medidata securities: “Yo get ready.”

116. On or about the following day, CC-8 began purchasing Medidata securities based on the MNPI GE had provided.

117. On or about May 14, 2019, Cordas and GE exchanged the following messages about “Maria,” a codename for Medidata:

GE:	yo bro
GE:	hows things
Cordas:	stressful bro, not having a good time right now
Cordas:	working my ass off and not enough energy to handle it all
Cordas:	Hopefully Maria will help take a little stress off next week (:
GE:	yeah bro
GE:	glad youre excited haha
GE:	[heart symbol]

118. On or about May 31, 2019, GE and CC-8 exchanged the following messages about the anticipated Medidata acquisition:

CC-8:	btw our other deal still on? You know how those things behave hor?
GE:	Yes of course
GE:	Bro
GE:	Next week
GE:	Kaching
CC-8:	Haha okay
GE:	[winking face emoji]

119. On or about June 10 and June 11, 2019, just before Dassault Systems announced publicly that it was acquiring Medidata, Cordas and CC-8 sold the Medidata securities they had purchased.

120. On or about October 24, 2019, SAFI tipped Cordas with MNPI that LVMH was planning an offer to acquire Tiffany, and SAFI and Cordas began purchasing Tiffany securities.

121. On or about the same day, October 24, 2019—four days before Tiffany announced that it had received an acquisition proposal from LVMH—Cordas sent the following message to Individual 3: “URGENT. Buy Tiffany Co. symbol is TIF. Load the f\*ckin’ truck up.”

122. On or about November 1, 2019, SAFI tipped Cordas with MNPI that Stryker was planning to acquire Wright Medical and both SAFI and Cordas began purchasing Wright Medical securities.

123. Later, on or about the same day, November 1, 2019, after the Bloomberg news service reported that Wright Medical was exploring a possible sale of the company, Cordas sent the following messages to Individual 1: “I loaded you up today on Wright Medical. \$1m position.

It is up another 10% now in after hours trading [5 sideways crying laughing emojis] | News out after market close that wright medical is exploring a sale. Lucky timing on my bet [winking emoji].”

124. On or about November 4, 2019, SAFI tipped Cordas with MNPI that Walgreens was considering a deal to take the company private and both SAFI and Cordas purchased Walgreens call options.

125. On or about the same day, November 4, 2019—one day before the Bloomberg news service reported that Walgreens was reviewing a potential deal to take the company private—Cordas sent the following messages to Individual 1: “Tomorrow you will hit \$4m | Watch Walgreens.”

126. On or about October 14, 2019, after SAFI tipped Cordas with MNPI obtained from CC-2 that Worldline planned to acquire Ingenico, Cordas began to purchase Ingenico call options in a brokerage account he controlled.

127. Two days later, on or about October 16, 2019, CC-8 began purchasing Ingenico call options based on the same MNPI about the company’s planned acquisition.

128. On or about October 23, 2019, SAFI purchased Ingenico securities.

129. On or about October 26, 2019, GE sent the following messages to Individual 6 asking him to recruit additional sources of MNPI to the insider trading scheme: “did you think about the thing we talked about in nyc? | [smiling tongue out emoji] | basically I told you i need to network with some people in nyc | bankers and such and was wondering if you could introduce me | im looking for investment bankers in big banks working in M&A specifically.”

130. On or about December 18, 2019—approximately six weeks before Worldline announced that it had agreed to acquire Ingenico—GE and CC-9 exchanged the following messages about a potential trader GE hoped CC-9 would introduce to the scheme:

GE: yo bro ive a huge deal in january

GE: if your friend is ready to chat

GE: should do it sooner

GE: so we can get her on that one

\*\*\*

CC-9: I'll make it happen for you

GE: thanks bro

GE: \$\$\$\$

\*\*\*

GE: tell her minimum 1m

GE: cannot lose

131. On or about April 14, 2020, GE and CC-3 exchanged the following Telegram messages, in which GE tipped CC-3 with MNPI from SAFI regarding the planned acquisition of Principia by Sanofi S.A.:

GE: Partner is recommending you to deleverage

CC-3: But any colors

CC-3: Is the next deal being delayed

GE: Yes

GE: And no

GE: May 4<sup>th</sup> deal so far on track

GE:	But Sanofi is delayed 2 weeks
CC-3:	So the may deal is not the sanofi deal??
GE:	No
GE:	My mistake
GE:	They both pharma
GE:	20bn deal is also medical devices
GE:	Sanofi is 100-200% upside btn
GE:	5 bil deal

132. On or about July 9, 2020—approximately seven days before Bloomberg reported that Sanofi was studying potential acquisitions of U.S. biotechnology companies, including Principia—GE and CC-3 began purchasing shares of Principia.

133. On or about August 18, 2020, SAFI purchased Alexion securities based on MNPI that AstraZeneca was planning to acquire Alexion for approximately \$39 billion.

134. Three days later, on or about August 21, 2020, SAFI sent the following Telegram messages to GE about the planned Alexion acquisition: “The blockbuster | is size 40bn usd | And is in the US.”

135. On or about the same day, GE and CC-3 began purchasing shares of Suez S.A., which traded under the ticker SEV, based on MNPI that Veolia was planning to acquire a stake in Suez—a deal that was announced approximately nine days later.

136. Approximately two days later, on or about September 1, 2020, CC-3 sent GE the following Telegram messages about the pending Suez deal: “Btw total for sev is about hkd 9m | Not bad right | Yours is 4.5 m.” GE responded: “Yeh | Not bad bro | Suitcase ready hahaha.” CC-3 replied: “Approx 577k usd | Or 580k.”

137. On or about August 28, 2020, GE purchased Alexion securities based on the MNPI SAFI had provided approximately one week earlier about the company's forthcoming acquisition.

138. On or about August 31, 2020, SAFI sent GE the following Telegram messages about the Alexion deal: "Tell him is deal of the year No.1 out of 3 | Sale side auction | 200m liquidity daily | Trading at huge discount | And market not having the info that they are on sale | Upside on deal closing 50-60% | On this weeks leak 15-20% | Which makes 4-6x on our options."

139. Later, on or about the same day, SAFI directed GE to "tell m100," a code name for CC-3: "It is crazy news for the market | Once the article comes | That this company is on sale . . . | Now they are in a structured selling process | Biogen has bid 145 . . ."

140. On or about the same day, CC-3 and GE exchanged Telegram messages about Alexion's share price, and CC-3 asked: "Are you certain that the news is coming out? But won't get canned like prnb last time?" GE responded: "Yes." On or about the same day, CC-3 purchased Alexion securities.

141. On or about September 1, 2020, GE relayed a Telegram message from CC-3 to SAFI 3 wanting to know "exactly when" the leak of MNPI regarding the Alexion deal would occur. SAFI responded, "Exactly that's a good one but tell him if the leak ever comes by a bad journalist which I have to pay for a very bad deal I can tell him exactly | Until then it is plus two minus two days | So Friday | Latest Monday | Please forward."

142. GE took a screenshot of SAFI's Telegram message and sent it to CC-3. CC-3 responded: "So next week?" GE replied: "Friday latest Monday like we said bro." CC-3 said: "Coz I was under impression like last night | Ok so we are taking market risk for next 4 days | I maxed out as you told me to | If I get cut I let you know over next few days." GE responded: "Ok look we leaked it already last night might take some time for article to be out."

143. Approximately two minutes later, SAFI sent the following Telegram messages to GE: “Bro tell him this one is a quality deal … | Despite the Biogen vid | Bid | Crazy news that they are on sale | We will see multiple rival bids | please forward.”

144. Later, CC-3 sent the following messages to GE: “Pls tell him that I do trust him just that we’re a bit levered this time as I was under the impression that it would be out within a day or 2 | So let’s just hope it works out.” In response, GE pasted a message to CC-3 from SAFI: “Yes I really appreciate his trust it is my honor to work with a personality like him. Tell him it is definitely possible that the leak might come any minute but ourselves we prefer to stay conservative and giving it until Friday latest over the weekend but on a deal like this Bloomberg and Reuters would fight for any minute earlier to have it exclusive.” CC-3 responded: “Ok I wouldn’t worry or even be asking at all if we aren’t that levered | I think we are ok for now let’s hope it comes out soon and market reacts | If I interpret correctly the news will have indic px from biogen?”

145. On or about September 16, 2020, GE sold more than 19,000 Alexion CFDs for proceeds of more than \$2.2 million after the online newsletter *Seeking Alpha* published an article suggesting that Biogen might be seeking to acquire Alexion, prompting Alexion’s stock price to increase.

146. On or about October 9, 2023, SAFI tipped GE with MNPI that Cytokinetics was the subject of a possible takeover, and both SAFI and GE purchased Cytokinetics call options over the BOX Exchange, in Boston, Massachusetts.

147. On or about October 12, 2023, GE sent SAFI the following Telegram message about CC-3: “He said he’s ready let’s do it.” SAFI responded: “Cytk | Tell him upside from here is 120% | At leak 40% | We wanna exit at leak … | And revisit the deal with options.”

148. On or about the same day, CC-3 purchased Cytokinetics shares.

149. On or about October 31, 2023, SAFI and GE sold nearly all of the Cytokinetics call options they had purchased after the Bloomberg news service published an article concerning the takeover interest in Cytokinetics, prompting the company's share price to increase.

150. On or about Friday, January 6, 2024—two days before the Wall Street Journal reported that Novartis was in advanced discussions to acquire Cytokinetics—GE sent CC-3 messages via Telegram, relaying MNPI from SAFI that news about the transaction would be announced the following Monday: “Monday pre market | Tell him a strategic sell process | Has very firm timelines | Situatie Packered: And owners of Cytk are not amateurs is Blackrock and co | We have 12bn usd more to buy.”

151. Later the same day, CC-3 sent GE the following Telegram messages: “Hi bro guess nothing to do tonight? | Still on track for Mon?” GE responded, relaying MNPI from SAFI: “Bro tell Ryan | We waiting if nova | Gies higher with bid | Because if leak comes | And we know that lets say nova wins at 124 | And leak take it to 140 | We sell | Or if it takes it to 120 | We well the short leg of the 125 call | Calls.”

152. On or about January 16, 2024, GE, CC-3, and CC-8 began to purchase MorphoSys call options based on MNPI that the company would be acquired.

153. On or about January 30, 2024, CC-3 likewise purchased shares of MorphoSys.

154. On or about February 6, 2024, GE sold MorphoSys call options for a profit of approximately \$3.5 million, one day after Novartis announced that it had agreed to acquire the company.

Overview of the Money Laundering Conspiracy

155. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, SAFI and GE conspired with each other, and with others known and unknown to the Grand Jury, including CC-1, Cordas, and CC-3, to engage in financial transactions, knowing that the property involved in the transactions represented the proceeds of securities fraud, and knowing that the transactions were designed to conceal and disguise the nature, location, source, ownership, and control of the proceeds of securities fraud.

Objects and Purposes of the Money Laundering Conspiracy

156. The object of the conspiracy was to commit money laundering. The principal purposes of the conspiracy were to conceal and disguise the nature, location, source, ownership, and control of the securities fraud proceeds, and to conceal the conspirators' actions from others, including regulators and law enforcement.

Manner and Means of the Money Laundering Conspiracy

157. Among the manner and means by which SAFI, GE, CC-1, Cordas, CC-3, and others known and unknown to the Grand Jury carried out the conspiracy were the following:

- a. Generating proceeds of securities fraud in brokerage accounts;
- b. Withdrawing securities fraud proceeds from brokerage and bank accounts in cash;
- c. Meeting with co-conspirators in person to transfer securities fraud proceeds in cash;
- d. Executing wire transfers to transfer securities fraud proceeds to bank accounts that co-conspirators controlled;
- e. Using bank and brokerage accounts in other individuals' names to evade detection;
- f. Lying to and misleading banks about the sources of and reasons for cash withdrawals and wire transfers; and

g. Taking steps to conceal the conspiracy from regulators, law enforcement, banks, and others, including by communicating about the transactions in person, using coded language and encrypted messaging applications, using prepaid cellular phones, and switching SIM cards.

Overt Acts in Furtherance of the Money Laundering Conspiracy

158. Beginning no later than in or about November 2016 and continuing through at least in or about February 2024, SAFI and GE, together with CC-1, Cordas, CC-3, and others known and unknown to the Grand Jury, committed and caused to be committed the following overt acts, among others, in furtherance of the money laundering conspiracy.

159. On or about August 9, 2018, Cordas caused 65,000 Euros to be transferred from an IG Markets brokerage account to a Československá obchodní banka, a.s. (“CSOB”) bank account in the name of Individual 2.

160. On or about August 13, 2018, Cordas withdrew 100,000 Euros to be withdrawn in cash from the CSOB bank account in the name of Individual 2.

161. On or about August 13, 2018, at SAFI’s direction, Cordas met with SAFI in Vienna, Austria, and handed him 100,000 Euros in cash.

162. On or about January 31, 2019, after CC-8 began selling Atos call options for a profit following the public announcement that Atos intended to spin off a stake in Worldline, GE sent CC-8 the following message about kicking back a portion of the illicit profits, “hey bro so now that you’re out already you can should start transfering the profits on my share to your bank | I gotta collect from you asap gotta pay some peeps [winking face emoji],”

163. Approximately one week later, on or about February 7, 2019, GE and CC-8 met in person at the Fullerton Hotel, in Singapore, and CC-8 gave GE a portion of his illicit trading profits in cash.

164. On or about March 8, 2019, GE and CC-10 exchanged the following coded messages about transferring a portion of the proceeds of CC-10's insider trading profits to SAFI, whom CC-10 referred to as their "friend":

CC-10:	Hey bro. Our friend told me there is something to collect. Problem is I am not in Sg. And only person who can get it is my best buddy. But he is stuck at my place cause he is a bit sick. You think it would be possible to hand it to him at my condo ?
GE:	im not in Singapore
GE:	haha
GE:	and im with our friend in another city
GE:	i don't think theres anything to collect
GE:	ive arranged
CC-10:	Ok cool
CC-10:	Perfect
CC-10:	:)
GE:	thanks bro
CC-10:	Say hi for me.
CC-10:	He asked me a few days ago.. and i just found a way today lol
CC-10:	Have fun
GE:	haha thnanks!

165. On or about March 18, 2019, GE and CC-10 exchanged the following coded messages in which they discussed having GE take over CC-10's role in laundering the proceeds of the insider trading scheme—which they referred to as “meat”:

CC-10:	Basically.. maybe you know. I am taking care of logistic for the meat business of our friends...
CC-10:	And these days i need to focus more on the IT department.
CC-10:	So I have to make the transition of this part of the business to you eventually.. and wanted to discuss with you the fees i usually take and if you think it would be good for you.
CC-10:	I will talk to Eamma [SAFI] then and see how i can make this transition to you
GE:	Yeah for sure
GE:	I got it
GE:	Thanks bro maybe I can even travel to where you are if it's important
CC-10:	Yes. Can you talk to eamma.. he will explain you why SG :)
CC-10:	Have fun
CC-10:	Cheers
GE:	got it

166. On or about March 25, 2019, GE and CC-10 exchanged the following coded messages, in which they again referred to SAFI as their “friend” and to the illicit insider trading proceeds as “meat”:

CC-10:	Yes. Our friend said you bring some meat right ?
--------	--

GE: we will meet but i wasn't informed about any meat

CC-10: He said 40kg

CC-10: He asked me to collect today.. thats why i thought you know

GE: no ill ask him now

CC-10: Ok thanks

167. On or about March 27, 2019, GE and CC-10 exchanged the following messages:

GE: Hey bro so I spoke to our friend and I realized there was a miscommunication

GE: Yeah I have the 40 kg meat for you but it might be a bit complicated to get it delivered this week as I might be going to Indo tomorrow

GE: Is it possible for me to pass you when we meet next in 10 days?

CC-10: Let me check buddy

CC-10: Hey bro

CC-10: Impossible to get them tmrw ?

CC-10: Cause they really needed it now

CC-10: I could drop by in the morning

GE: No it's not possible because I don't have them in my prrsonal fridge

168. On or about April 2, 2019, GE and CC-10 exchanged the following coded messages about wiring insider trading proceeds in U.S. dollars to a bank account CC-10 controlled:

CC-10: Hello bro

CC-10: When could you bring the meat to my friend.

CC-10: He could collect the 40 kg everyday after work

CC-10: 7pm onwards at his wharehouse

GE: I'll see what I can do

GE: Bro the meet should be us meat or sg meat

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CC-10: Ok. Actually can deposit the american meat. Directly on my personnal fridge.

CC-10: Gimme your number. I will give you the exact address of the warehouse

GE: I can deposit

CC-10: Cool

CC-10: [thumbs up image]

CC-10: Awesome Thats really helpfull cause it allows me to ship it fresh. Very fast

GE: Okay great

GE: I'll write you these days to arrange it

GE: I can't promise by tomorrow but by this week it's ok

GE: Hey bro please send me your account details so I can send you the funds for the meat

CC-10: Ok

GE: I'll send you via citybank

CC-10: Yep

GE: So if you're citybank account would be much easier

CC-10: I have dbs multicurrency sorry

GE: It's fine I'll just get it sent

GE: Will do it tomorrow ok

GE: Will go to my bank to get it done

CC-10: DBS  
Branch: Suntec City  
Bank Addr: 3E Temasek Blvd, 709-711, Singapore  
038984  
Account holder :[CC-10 name]  
(iban): [redacted]  
multi-currency account: [redacted]

GE: Got it

GE: And I can send USD there without any currency change right

CC-10: Yes

GE: Okay sounds good tomorrow will get it done

CC-10: Ok try to make it early if possible. Cause I will need to send the meat for an urgent catering ... in europe.

CC-10: Thanks a lot !

169. On or about April 4, 2019, GE caused a \$40,000 wire to be sent from a bank account he controlled to a Development Bank of Singapore bank account in the name of CC-10.

170. On or about April 1, 2020, at the direction of GE and SAFI, Cordas caused a \$300,000 wire to be sent from a Bank of America account he controlled to an account in the name of Individual 7. At GE's instruction, Cordas falsely advised the bank that the purpose of the transfer was to acquire personal goods.

171. On or about April 9, 2020, GE caused a DHL box to be shipped to Cordas's address in the United States, with a label falsely indicating it was from Individual 7.

172. On or about September 1, 2020, approximately two days after the announcement that Veolia had offered to acquire a stake of Suez, GE and CC-3 exchanged the following Telegram

messages, in which they discussed kicking back a 50 percent share of CC-3's illicit proceeds from trading on the deal in a suitcase full of cash:

CC-3: Btw total for sev is about hkd 9m  
CC-3: Not bad right  
CC-3: Yours is 4.5m  
GE: Yeh  
GE: Not bad bro  
GE: Suitcase ready hahaha  
CC-3: Approx 577k usd  
CC-3: Or 580k  
GE: Nice bro  
CC-3: Last time still owe you 345k

COUNT ONE  
Conspiracy to Commit Securities Fraud  
(18 U.S.C. § 1349)

The Grand Jury charges:

173. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 154 of this Indictment.

174. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

conspired with one another, and with others known and unknown to the Grand Jury, to commit securities fraud, that is, to knowingly execute and attempt to execute a scheme and artifice (a) to defraud persons in connection with securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.; and (b) to obtain, by means of false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co.,

Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc., in that SAFI and GE traded in the securities of those companies while in possession of material non-public information and provided material non-public information to other co-conspirators so that they could trade in the securities of those companies, in violation of Title 18, United States Code, Section 1348.

All in violation of Title 18, United States Code, Section 1349.

COUNT TWO  
Conspiracy to Commit Securities Fraud  
(18 U.S.C. § 371)

The Grand Jury charges:

175. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 154 of this Indictment.

176. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

conspired with one another, and with others known and unknown to the Grand Jury, to commit an offense against the United States, to wit, securities fraud, in violation of Title 15, United States Code, Sections 78j(b) and 78ff, and Title 17, Code of Federal Regulations, Section 240.10b-5, that is, knowingly and willfully, by the use of means and instrumentalities of interstate commerce, the mails, and the facilities of a national securities exchange, directly and indirectly to use and employ manipulative and deceptive devices and contrivances in connection with the purchase or sale of securities in contravention of Rule 10b-5 of the Rules and Regulations promulgated by the United States Securities and Exchange Commission, and to (a) employ a device, scheme, and artifice to defraud; (b) make untrue statements of material facts and omit to state material facts necessary in order to make the statements made, in light of circumstances under which they were made, not misleading; and (c) engage in acts, practice, and courses of business which would and did operate

as a fraud and deceit in connection with the purchase and sale of securities, including The Advisory Board Company, Alexion Pharmaceuticals Inc., Atos S.E., Cytokinetics, Inc., Gemalto N.V., Ingenico Group S.A., Kindred Healthcare, Inc., Medidata Solutions, MorphoSys A.G., Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.

All in violation of Title 18, United States Code, Section 371.

COUNT THREE  
Securities Fraud; Aiding and Abetting  
(18 U.S.C. §§ 1348 and 2)

The Grand Jury charges:

177. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 154 of this Indictment.

178. On various dates between on or about November 18, 2016 and on or about February 6, 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

knowingly executed, and attempted to execute, a scheme and artifice (a) to defraud persons in connection with securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.; and (b) to obtain, by means of false and fraudulent pretenses, representations and promises, money and property in connection with the purchase and sale of securities of issuers with a class of securities that was registered under Section 12 of the Securities Exchange Act of 1934, including Alexion Pharmaceuticals Inc., Cytokinetics, Inc., Kindred Healthcare, Inc., Medidata Solutions, Pinnacle Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc., in that SAFI and GE traded in the securities of

those companies while in possession of material non-public information and provided material non-public information to other co-conspirators so that they could trade in the securities of those companies.

All in violation of Title 18, United States Code, Sections 1348 and 2.

COUNT FOUR  
Securities Fraud; Aiding and Abetting  
(15 U.S.C. § 78j(b) and 78ff(a); 17 C.F.R. § 240.10b-5; 18 U.S.C. § 2)

The Grand Jury charges:

179. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 154 of this Indictment.

180. On various dates between on or about November 18, 2016 and on or about February 6, 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

did knowingly and willfully, by the use of means and instrumentalities of interstate commerce, the mails, and the facilities of a national securities exchange, directly and indirectly use and employ manipulative and deceptive devices and contrivances in connection with the purchase or sale of securities in contravention of Rule 10b-5 of the Rules and Regulations promulgated by the United States Securities and Exchange Commission, and did (a) employ a device, scheme, and artifice to defraud; (b) make untrue statements of material facts and omit to state material facts necessary in order to make the statements made, in light of circumstances under which they were made, not misleading; and (c) engage in acts, practice, and courses of business which would and did operate as a fraud and deceit in connection with the purchase and sale of securities, including The Advisory Board Company, Alexion Pharmaceuticals Inc., Atos S.E., Cytokinetics, Inc., Gemalto N.V., Ingenico Group S.A., Kindred Healthcare, Inc., Medidata Solutions, MorphoSys A.G., Pinnacle

Foods, Inc., Principia Biopharma Inc., Syntel, Inc., Tiffany & Co., Wright Medical Group, N.V., and Walgreens Boots Alliance, Inc.

All in violation of Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, Title 18, United States Code, Section 2.

COUNT FIVE  
Money Laundering Conspiracy  
(18 U.S.C. § 1956(h))

The Grand Jury charges:

181. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 172 of this Indictment.

182. From in or about at least November 2016 through in or about at least February 2024, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

conspired with one another, and with others known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions, knowing that the property involved in such transactions represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, securities fraud, in violation of Title 18, United States Code, Section 1348, Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, as charged in Counts One and Two, and knowing that the transactions were designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT SIX

Money Laundering; Aiding and Abetting  
(18 U.S.C. §§ 1956(a)(1)(B)(i) and 2)

The Grand Jury charges:

183. The Grand Jury re-alleges and incorporates by reference paragraphs 1 through 172 of this Indictment.

184. On or about April 1, 2020, in the District of Massachusetts and elsewhere, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

conducted and attempted to conduct a financial transaction, to wit a wire transfer of \$300,000 from Bank of America account ending in x4046 to a China Construction Bank account, knowing that the property involved in such transaction represented the proceeds of some form of unlawful activity, and which in fact involved the proceeds of specified unlawful activity, that is, securities fraud, in violation of Title 18, United States Code, Section 1348, Title 15, United States Code, Sections 78j(b) and 78ff(a), Title 17, Code of Federal Regulations, Section 240.10b-5, as charged in Counts One and Two, and knowing that that the transaction was designed, in whole and in part, to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

FORFEITURE ALLEGATION  
(18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

185. Upon conviction of one or more of the offenses charged in Counts One, Two, Three, and Four, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses.

186. If any of the property described in Paragraph 185, above, as being forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 185 above.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

**MONEY LAUNDERING FORFEITURE ALLEGATION**  
(18 U.S.C. § 982(a)(1))

187. Upon conviction of one or more of the offenses charged in Counts Five and Six, the defendants,

(1) EAMMA SAFI,  
a/k/a “TT,”  
a/k/a “Yummy,”

and

(2) ZHI GE,  
a/k/a “Josh Ge,”  
a/k/a “Josh Gez,”  
a/k/a “Jay Gat,”

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offenses, and any property traceable to such property.

188. If any of the property described in Paragraph 187, above, as being forfeitable pursuant to Title 18, United States Code, Section 982(a)(1), as a result of any act or omission of the defendants --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property described in Paragraph 187 above.

All pursuant to Title 18, United States Code, Section 982(a)(1).

A TRUE BILL

  
W.C. Robinson  
FOREPERSON

  
\_\_\_\_\_  
IAN J. STEARNS  
STEPHEN E. FRANK  
SETH B. KOSTO  
MACKENZIE A. QUEENIN  
ASSISTANT UNITED STATES ATTORNEYS

District of Massachusetts: July 9, 2024  
Returned into the District Court by the Grand Jurors and filed.

  
\_\_\_\_\_  
Karen Hutchins  
DEPUTY CLERK